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REPLY TO: ROCHESTER

November 8, 2019

VIA FAX

Hon. Frank P. Geraci, Jr.
Chief Judge
United States District Court
100 State Street
Rochester, NY 14614

Re: *United States v. Patrick Carlineo*, 19-MJ-4052-MWP

Dear Judge Geraci:

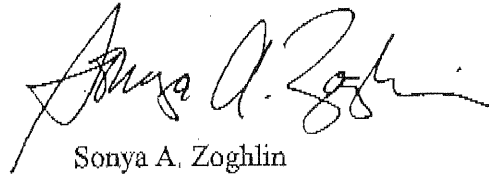
I am writing to request a modification in Mr. Carlineo's conditions of pre-trial release. Specifically, I am asking the Court to modify the condition of home confinement by imposing a curfew of 6:00 a.m. to 10:00 p.m. *This request is consistent with the recommendation of his pre-trial supervising officer, Jeremy Bedette.* Mr. Carlineo has been under home confinement since his release on May 3, 2019. Other than a relatively minor violation for marijuana use, he has been entirely compliant with the conditions of his release. He has now completed chemical dependency treatment and continues to be engaged in mental health counseling. He has not given probation any reason to believe he is either a danger to the community or a risk of flight.

In addition, I am asking the Court to permit Mr. Carlineo to travel to Boston, leaving November 13th and returning November 16th. The purpose of this trip would be to participate in the "Restorative Justice Program" run by the United States Department of Probation in the District of Massachusetts. This program focuses on exploring accountability, harm, and making amends. It involves other defendants, community victims, and court family members, and begins with an intensive, two-day workshop to be held this year on November 14th and 15th from 8:30 a.m. to 4:30 p.m. at the Courthouse in Boston. I have consulted with Probation in this district and confirmed that there is no analogous program offered here.

While I have no reason to believe the government will object to these requests, I have not yet received a response from them to my recent inquiry.

Thank you for your consideration.

Respectfully,



Sonya A. Zoghlin
Assistant Federal Public Defender

cc: Brett Harvey, AUSA (via fax)
Jeremy Bedette, USPO (via fax)

Harris has been advised by counsel for defendant that he is withdrawing his request to travel to Boston for the "Restorative Justice Program," that request is no longer before the Court. Harris has been advised by AUSA Harvey that he does not object to Probation's recommendation to modify the home detention condition to a ~~6pm~~ 9pm to 6am curfew, and for good cause shown, this Court approves that request.

SO ORDERED

Maia W. Puyson

WMD

11/13/19